

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA

)	
ERNEST DAVID HUNT,)	
)	
Plaintiff,)	
)	
v.)	Case No. 7:23-cv-452
)	
UNITED STATES OF AMERICA,)	
)	
Defendant.)	
_____)	

VIDEOTAPED DEPOSITION

OF

ERNEST DAVID HUNT

Taken by Defendant

Monday, February 5, 2024

Charlotte, North Carolina

Reported by: Christine A. Taylor, RPR

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U.S. DEPARTMENT OF JUSTICE

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16 Also Present:

17 Brent Troublefield, Videographer

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1 MS. SPRAYREGEN: Do you -- should we
2 take another break?

3 MR. LEE: Sure, let's take a break.

4 THE VIDEOGRAPHER: Off record at
5 3:19 p.m.

6 (Recess taken from 3:19 p.m. until 3:34 p.m.)

7 THE VIDEOGRAPHER: On record at
8 3:34 p.m.

9 BY MS. SPRAYREGEN:

10 Q. So we've just been discussing all the
11 other diseases that -- in response to the question
12 "What diseases or injuries does the claimant assert
13 related" -- withdrawn.

14 We've just been discussing anemia,
15 diabetes, gastroesophageal reflux disease,
16 hyperlipidemia, hypertension, coronary artery
17 disease, neuropathy, and sleep apnea; right?

18 A. Yes.

19 Q. Okay. Great. Is you -- are you
20 claiming in this lawsuit that these diseases were
21 caused by your kidney cancer or noncancer kidney
22 disease, or are you causing -- claiming that they
23 were caused by the water at Camp Lejeune?

24 A. I think they was related, yes.

25 Q. Related to what?

1 A. To the water contamination.

2 Q. At Camp Lejeune?

3 You're claiming in this lawsuit that
4 these eight conditions or diseases were caused by
5 the water at Camp Lejeune?

6 A. I think they are.

7 Q. And do you currently smoke?

8 A. No.

9 Q. Have you ever smoked?

10 A. No.

11 Q. So I have medical records that say that
12 you used to smoke. I can introduce them, but do
13 you care to revise what you just said?

14 A. Every once in a while, like a birth of
15 a baby or a celebration, I might smoke a cigar.
16 But that doesn't mean I'm a smoker because I -- I
17 might only smoke one or two cigars a year. Does
18 that make me a smoker?

19 Q. Do you smoke -- have you ever smoked
20 cigarettes?

21 A. When I was kid, yes, I smoked some.

22 Q. From -- when you say when you were a
23 kid, what ages?

24 A. I think I was probably eight years old
25 and found a packet of cigarettes -- brand new pack